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wisor telecom

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February 1, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of *Ex Parte* meeting:
Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance
CC Docket No. 98-56
RM-910-1

Dear Ms. Roman Salas:

On Friday, January 29, 1999, David Hughes, Bangalore Shivacharan, Silvio Renzi and David Curtis of Wisor Telecom Corporation (Wisor), met with Andrea Kearney, Claudia Pabo, Claudia Fox, Daniel Shiman, Bill Bailey, David Kershner, Jake Jennings and William Sharkey and John Reel, all of the Policy and Program Planning Division of the Federal Communications Commission's Common Carrier Bureau.

The purpose of the meeting was to discuss Wisor's experiences in assisting CLECs with their OSS Interconnections to the ILEC trading partners. Mr. Hughes and Mr. Shivacharan, and the rest of the Wisor team, also discussed Wisor's perception of the industry problems with the current OSS model and Wisor's OSS solutions to alleviate these problems. In addition, the long term health of the competitive telecommunications carrier industry was discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Vaikunth N. Gupta
President & CEO
Wisor Telecom Corp.

cc: Andrea Kearney
Claudia Pabo
Claudia Fox
Daniel Shiman
Bill Bailey
David Kershner
Jake Jennings
William Sharkey
John Reel

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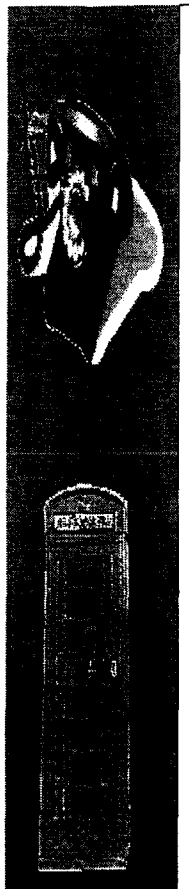

wisor telecom

Innovative
OSS
SOLutions
For Competitive Carriers

A Status Report To The FCC

January 29, 1999

Wisor Telecom
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Wisor Telecom – A View of The Industry

Agenda:

- Our Objective Today
- Wisor Telecom Overview
- Our Experiences & Lessons Learned
- Recommendations for Improving the Competitive Process

Wisor Telecom

Our Objective Today:

- Provide a Different Perspective About Our Industry
- Share Wisor Telecom's View of the Pitfalls Which Lie Ahead and How to Avoid Them
- Discuss Forward Looking Initiative to guarantee Long Term Health of the Competitive Telecommunications Industry

Wisor Telecom – Who We Are

Company Profile:

- Headquartered in the Washington DC metropolitan area
- An ability to attract key industry talent
- Aggressive Development Schedule - 16 Hour Work Days
- Patent Disclosures on several critical components of the WisorGate software architecture
- Started operations Jul '97

Wisor Telecom – Who We Are

The Wisor Team:

The Management Team

Vaikunth N. Gupta
President & CEO

Bangalore S. Shivacharan
Technology Officer

Dave R. Hughes
VP - Marketing & Sales

Silvio Renzi
Director - Product Marketing

Todd Logan
Director – Customer Operations

Dave Curtis
OSS Architect

Board of Directors

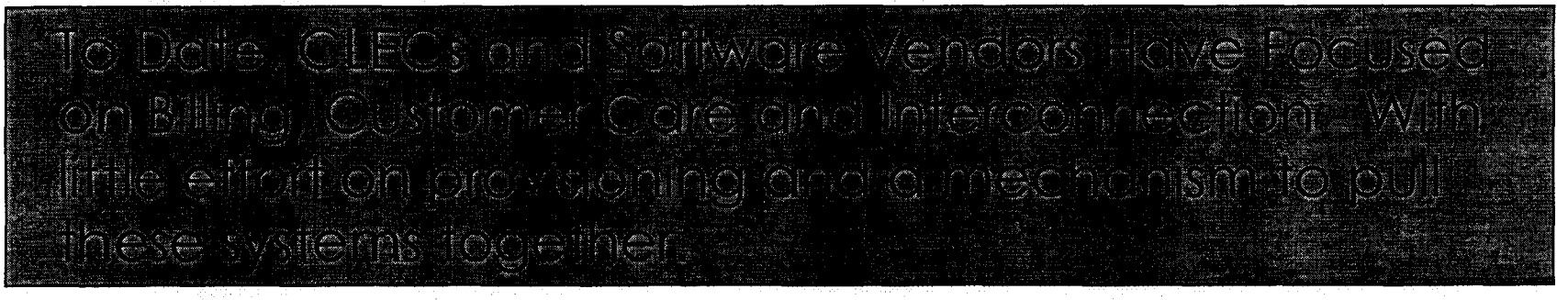
Vaikunth N. Gupta	CEO & Director
Marc Benson	VP of Mid-Atlantic Venture Fund
Monro B. Lanier III	Vice President - Hickory Venture Group
John G. Puente	Chairman Telogy Networks, formerly CEO of now-Hughes Networks, Orion Networks Systems, and a Founder of Telecom USA; Board Member - Primus & Micros
Mark Mendes	Chief Operating Officer of NET2000

The Advisory Board

Pradeep Kaul	Exec VP. Hughes Network Systems
Sidney Kahn	Managing Partner, VenKahn
Thomas H. Scholl	Founder & Former CEO, Telogy Networks

Wisor Telecom – Who We Are

Wisor's View of What's Needed to Help CLECs Succeed:

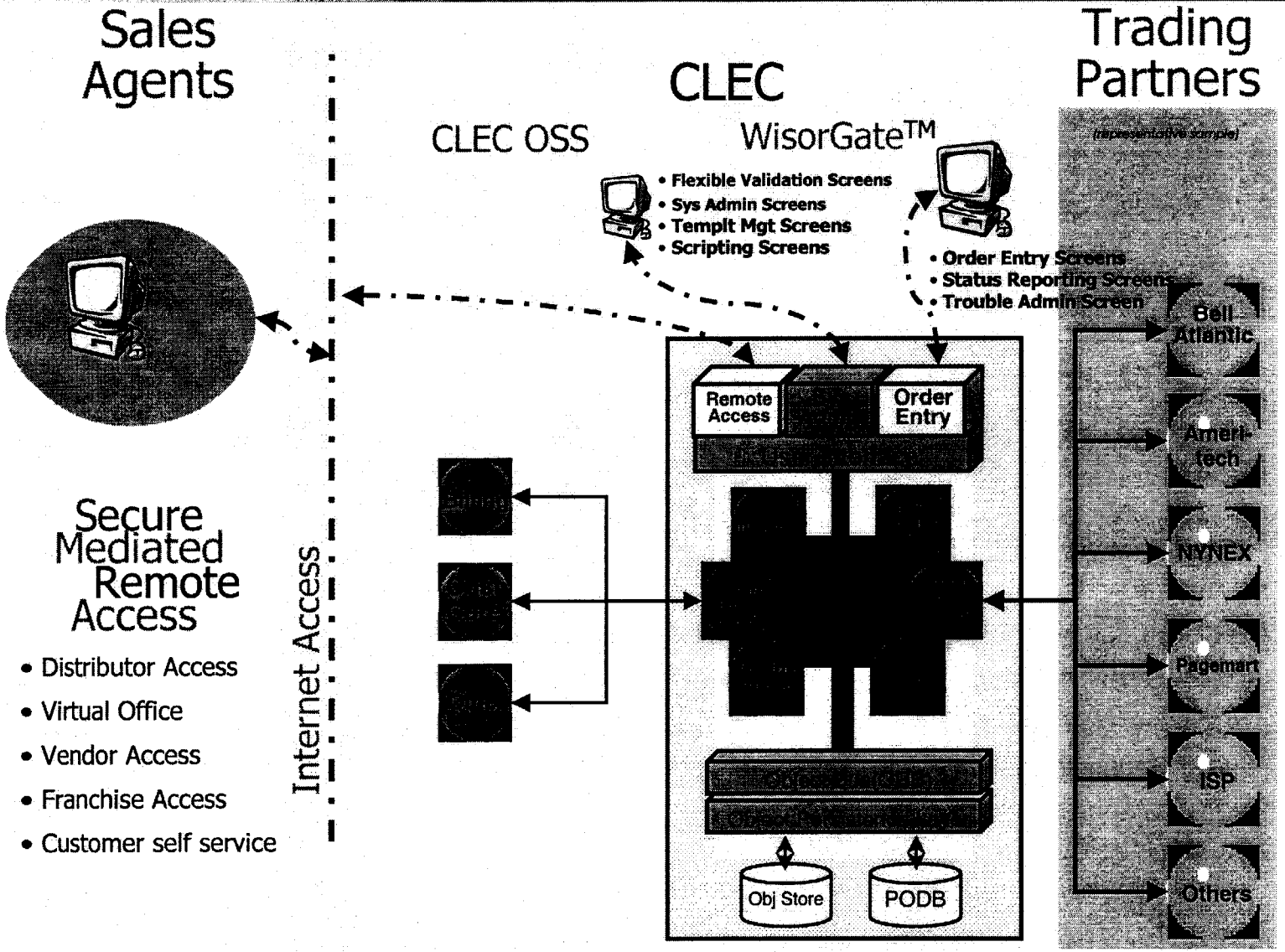


What's Needed:

- Major focus on order management
- Treat EDI as a component of order management
- Scalable systems which can start small and grow with the CLEC
- Understanding of industry trends, history, standards and systems

Wisor Telecom – Who We Are

Wisor's View of What's Needed to Help CLECs Succeed:

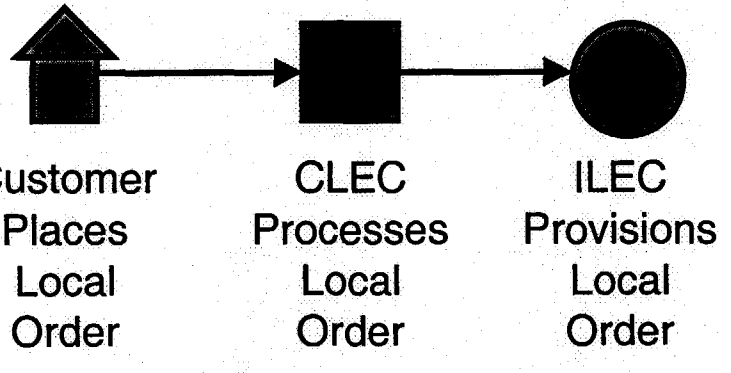


Our Experiences & Lessons Learned:
What Led The Industry to this Point?

Original Assumptions:

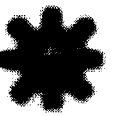
- The key to interconnection is EDI and the EDI gateway
- Plain Total Services Resale (TSR) will be profitable
- Resale supports local service only
- A CLEC will have only 1 wholesale trading partner in a region

Resulting/Original Model:



Our Experiences & Lessons Learned:

Major CLEC Business Challenges:



- Small margins for non-facilities based CLECs
- Raising money for network and operations build-outs
- Customer acquisition and retention - delays in converting service resulting in disgruntled customers
- Inefficient and ineffective communications with ILEC Trading Partners
  - the need to negotiate Joint Inter-connect Agreements

Our Experiences & Lessons Learned:

Major CLEC Operational Challenges:

- Cost effective process automation
  - order management
  - order decomposition
  - service provisioning
  - exception handling
- Operational efficiency through automated workflow management
- Trading partner interchange
- Status reporting & metrics

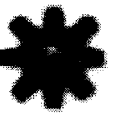
Our Experiences & Lessons Learned:
What Led The Industry to this Point?

An Inherently Flawed Model: 

- Competitive Carriers Need To Provide Bundled Services which may include Local, LD, Video, Wireless, etc.
- There may be a facilities component to portions of the order
- External interconnection is not only required for local – inside wiring, directory advertisement, video, ASR, etc.
- Competitive Carriers need to interconnect with entities other than the ILECs – other CLECs, Vendors, Industry Databases, etc.
- To be truly profitable, Competitive Carriers must have "some" facilities – they cannot merely depend on resale
- Competitive Carriers may lose customers to competitors – therefore they must support some "ILEC wholesale" type functions

Our Experiences & Lessons Learned:

A More Realistic Model:



Wisor Assumptions:

- The key to interconnection is Order Management, not EDI
- Competitive Carriers will have more than 1 trading partner per region
- Profitable Competitive Carriers will require support for facilities and non-facilities based provisioning
- Competitive Carriers will provide bundled/convergent services
- Competitive carriers will trade with other Competitive Carriers, Wholesalers, Retailers, Vendors and Industry Databases
- Supported services will not be limited to local – they may include LD, ASR, xDSL, VoIP, VoN, Video, Wireless, Utilities, etc....

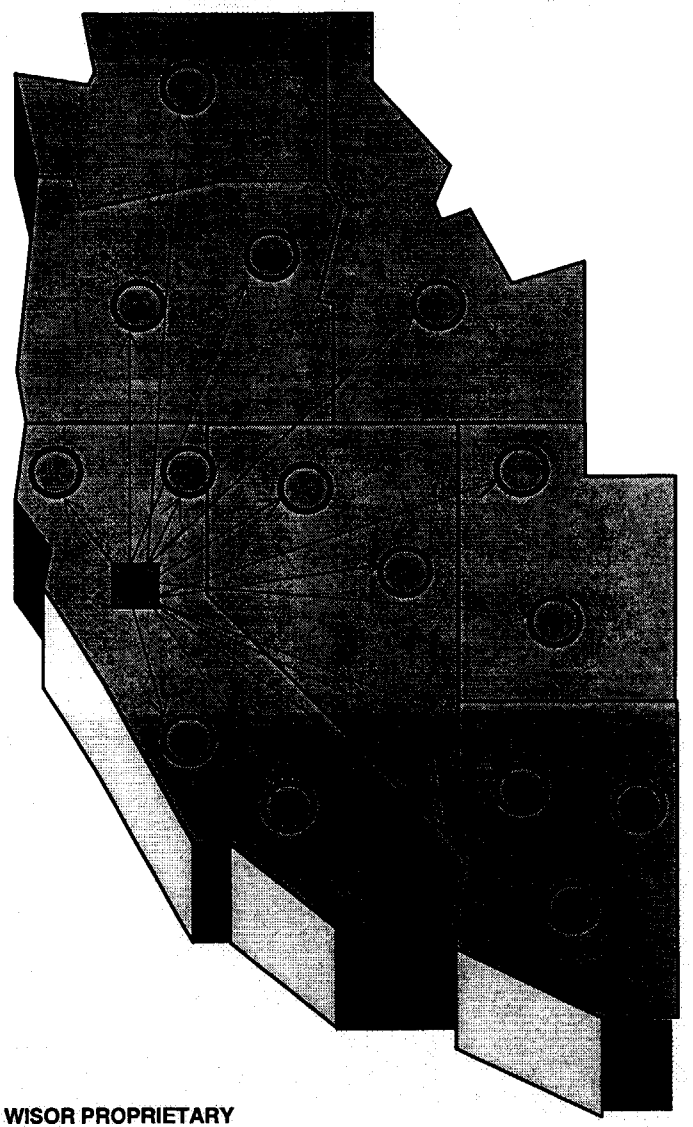
The Majority of Competitive Carriers Developed their OSS based on the Orginal Interconnection Model: Those Carriers Will Find It Difficult to Support Their Future Requirements With Those Systems

Our Experiences & Lessons Learned:

A More Realistic Model:

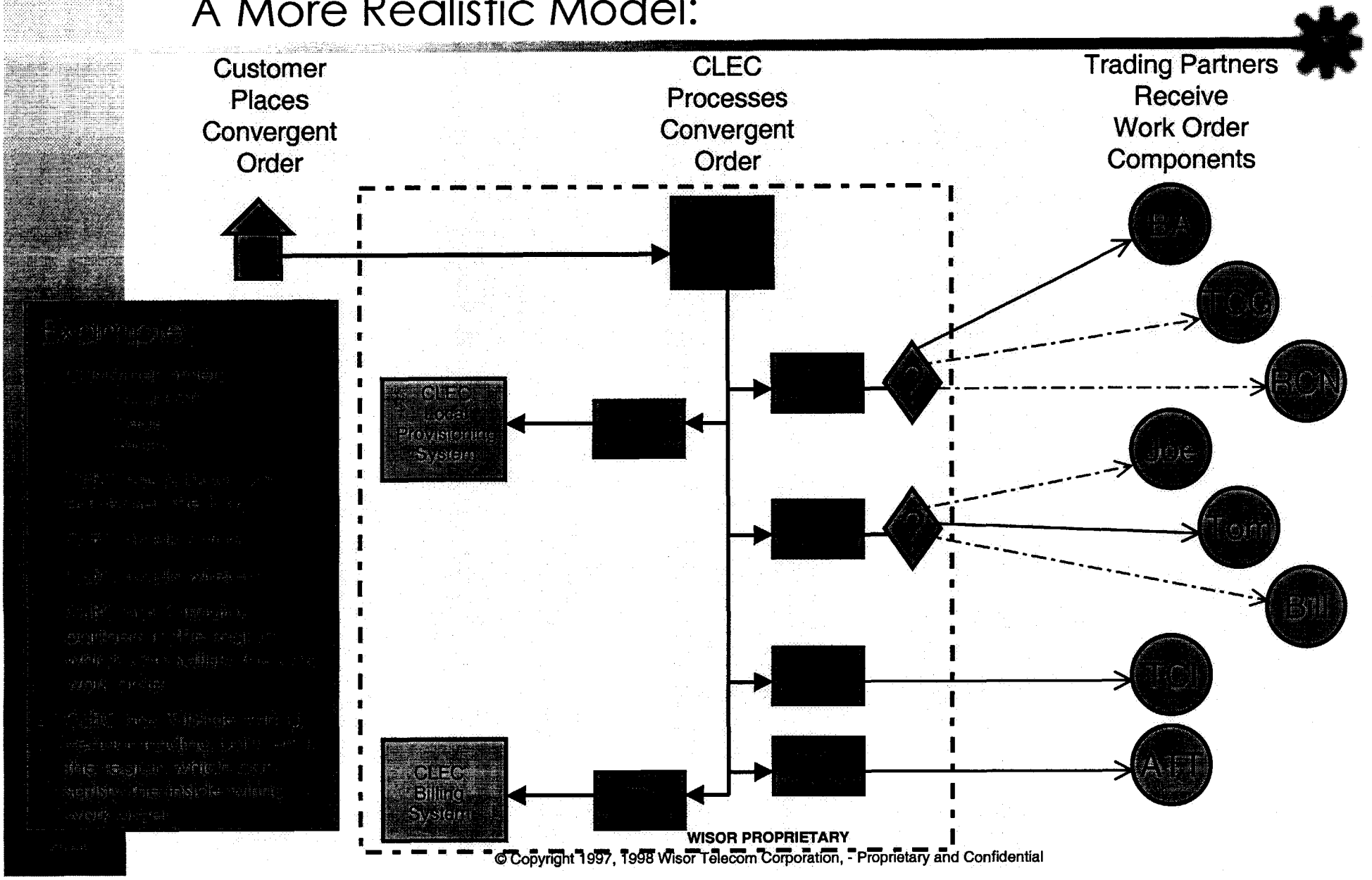
A More Realistic Model:

A hypothetical Competitive Carrier in California may have 15 trading partners in the Western States, more than 1 per region and not all of which are ILECs.



Our Experiences & Lessons Learned:

A More Realistic Model:



Our Experiences & Lessons Learned:

What's Necessary to Support this Model:

Automated Order Management:

- Traditionally, the role of OSS has been to mechanize processes which would otherwise be handled by human intervention
- The industry's major focus has been billing & customer care.
- Order management has been a hodge-podge of manual & mechanized elements chaotically tied together
- Current approach has worked so far due to various factors;
  - Low transaction volumes
  - Small number of trading partners supported by each Competitive Carrier
  - Low margins throughout the industry
- Automated Order Management Requires:
  - A workflow engine to integrate all other systems and act as gatekeeper and traffic cop
  - Industry standards which define transactions and business rules associated with those transactions

Our Experiences & Lessons Learned:

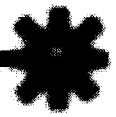
What's Necessary to Support this Model:

Order Decomposition (as a function of Order Management):

- Service Orders are composed of various, independent elements/tasks – all of which must be completed in order to complete an order.
  - These multiple element/tasks, or work orders, impact different systems, databases, trading partners, vendors, etc....
- Order Decomposition is a prerequisite for Convergent Services Ordering;
  - Multiple services are requested on the same order
  - The Order Manager must decompose the various independent components of the single/convergent order
  - These decomposed work orders must be managed independently
  - The relationship of independent work orders to the original order must be maintained

Our Experiences & Lessons Learned:

What's Necessary to Support this Model:



"Circuit Design":

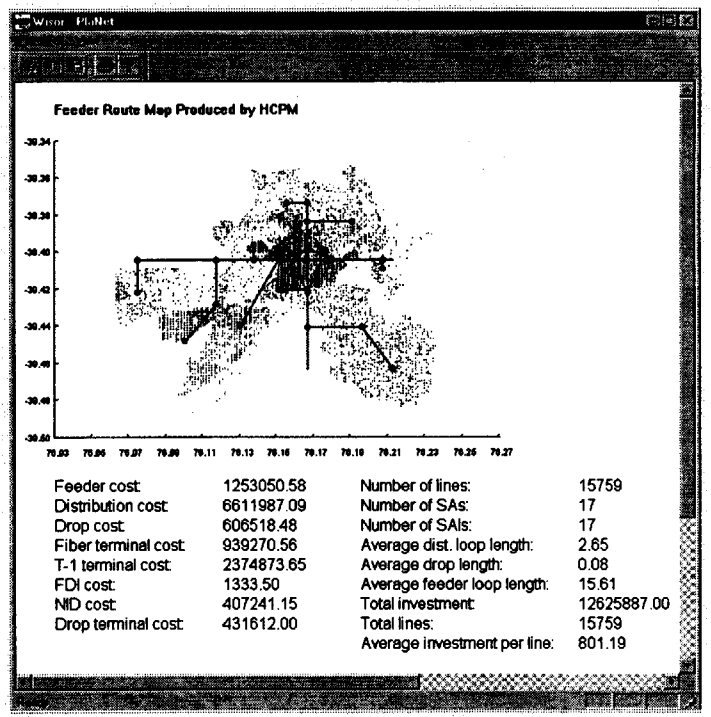
- Circuit design is typically considered a factor only for facilities based carriers
- With the "multiple trading partner per region scenario", Competitive Carriers will have a need for "Virtual" Circuit Design
  - With multiple options to satisfy a particular work order, the Order Manager must determine which is the most beneficial
- Competitive Carriers must maintain a complete and accurate inventory of equipment, facilities and capacity.

Our Experiences & Lessons Learned:

What's Necessary to Support this Model:

Network Planning:

- Integrate the FCC's Hybrid Proxy Cost Model (HPCM) into network planning efforts
- Use the HPCM to determine loop design on a cost minimization basis
- Use the HPCM to determine network design/cost based on forward looking technologies

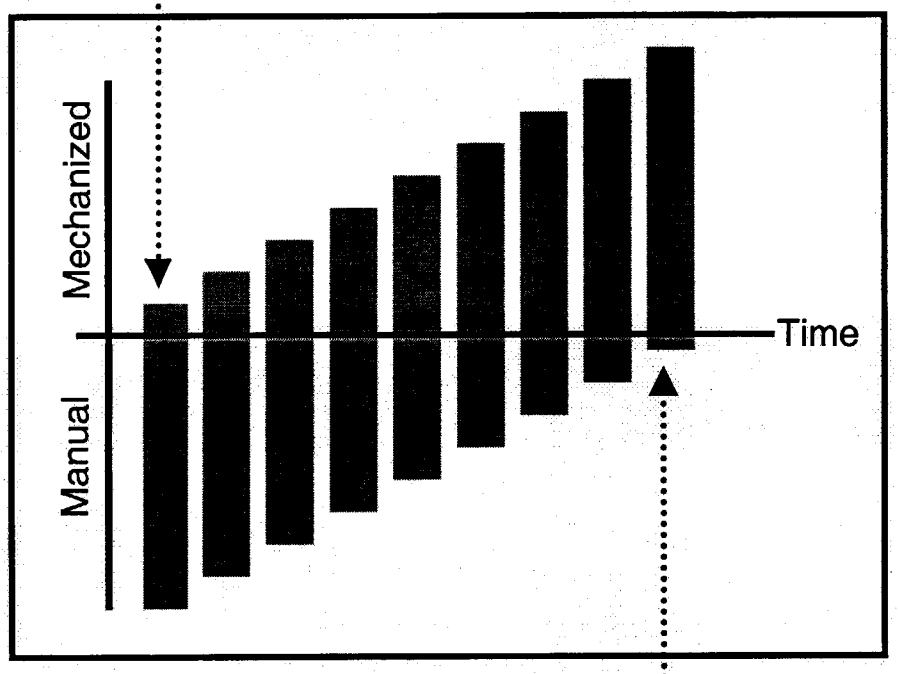


Our Experiences & Lessons Learned:

What's Necessary to Support this Model:

Flexible & Highly Scalable OSS Platform:

- The OSS platform must be affordable for startups yet scalable enough for growing and established companies
- The OSS platform must be capable of growing with the company



Our Experiences & Lessons Learned:

Recommendations on Improving the Process:

- Less focus on EDI, more focus on the overall process/problem
- Define Use of the Hybrid Network
  - Includes resale, facilities, switched, packet...
- The facilities required to satisfy a customers request should be viewed as a Virtual Private Network
- Development of industry standards needs to incorporate the impact of convergent services
  - We shouldn't focus only on local resale